



American Express
Travel Related Services Company, Inc.
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37802

July 17, 1998

Docket Clerk
U.S. Department of Transportation
Room PL-401
Docket No. OST-95-950
400 7th Street SW
Washington, DC 20590

OST-95-950-94

DOCKET SECTION

98 JUL 20 PM 2:18

DEPARTMENT OF TRANSPORTATION

Subject: **PASSENGER MANIFEST INFORMATION -
FINAL RULE DOCKET NO. OST-95-950
14 C.F.R. PART 243**

Dear Sir or Madam:

American Express Travel Related Services Company, Inc. submits these comments in response to the National Air Carrier Association's June 18, 1998 Petition for Reconsideration to modify 14 CFR §243.7 and the comments of the Air Transport Association of America in support of its petition.

We would like to reiterate our comments submitted on this issue on November 11, 1996, a copy of which is attached. We wholeheartedly support the collection of passenger information to speed notification in the event of an air disaster. We urge you, however, to maintain the requirement that the actual travel supplier, the air carrier, collect the information. The air carrier, not the travel agent, is in the best position to know who actually boards a flight. It is routine for travelers, especially business travelers, to change their travel plans at the last minute and to make those changes directly with the airlines. Only the airlines can know who is actually on their flights.

In addition, if you mandate that agents collect passenger manifest information it will no longer be necessary for the airlines to compensate agents for the service. Since the date of our original comments airlines have yet again reduced travel agent commissions. Agents, therefore, are working on thinner and thinner margins. Since airlines first started reducing commissions, thousands of agents have been forced to close their doors. The majority of the remaining ones must now charge customers service/transaction fees to remain viable. Requiring agents to collect passenger manifest information will simply increase service fees to consumers.

Travel agents are merely sales agents of the principal airlines. Agents would be happy to perform any service on behalf of an airline for proper remuneration. The legal requirement, however, should remain on the principal. Passenger information is needed only in the event of an air disaster so the airlines should rightly bear the burden of this cost.

Sincerely,

A handwritten signature in black ink, appearing to read "Ed Gilligan", with a horizontal line extending to the right from the end of the signature.

Ed Gilligan
President, Corporate Services